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Attorneys for Defendant
Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF SHANE BRUN IN
SUPPORT DEFENDANT OTTO
TRUCKING'S RESPONSE TO WAYMO'S
SUPPLEMENTAL OPPOSITION TO
OTTO TRUCKING'S MOTION FOR A
SEPARATE TRIAL [DKT. 2056]**

Courtroom: 8 (19th Floor)
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:
1. Response to Oppositions Motion for
Separate Trial

Trial: December 4, 2017

1 I, SHANE BRUN, declare:

2 1. I am a partner with the law firm Goodwin Procter LLP. I am a member in good
3 standing of the Bar of the State of California and the Bar of this Court. I make this declaration
4 based on personal knowledge and, if called as a witness, I could and would testify competently to
5 the matters set forth herein. I make this declaration in support of Defendant Otto Trucking's
6 Response to Waymo's Supplemental Opposition to Otto Trucking's Motion for a Separate Trial.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of the document titled Otto
8 Trucking LLC's notice of motion and motion for a separate trial filed September 26, 2017.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of the document titled Otto
10 Trucking's supplement to its motion for summary judgment filed October 3, 2017.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the deposition
12 of Lior Ron, dated October 2, 2017.

13 5. Attached hereto as Exhibit 4 is a true and correct copy of the document titled order
14 granting motion to compel Stroz documents and denying motions to quash filed June 21, 2017.

15
16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct. Executed this 25th day of October, 2017 in San Francisco, California.

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19 /s/ Shane Brun
20 SHANE BRUN
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 25, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 25, 2017**.

/s/ Hong-An Vu

ATTORNEY ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Hong-An Vu, hereby attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signatures (/s/) within this e-filed document.

Dated: October 25, 2017

/s/ Hong-An Vu